

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**Cambridge Electric Light Company  
and Commonwealth Electric Company,  
d/b/a NStar Electric**

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**D.T.E. 04-60**

**ATTORNEY GENERAL'S  
FIRST SET OF DOCUMENT AND INFORMATION REQUESTS**

- AG-1-1      During the term of the contracts have the Companies had any disputes with the vendor? If yes, please provide for each dispute the date of the dispute, the amount of the disputed costs, how the dispute was resolved, how any dispute related charges, credits or settlement amounts were accounted for, and the date the dispute was resolved. Include all correspondence between parties to the dispute, any internal correspondence regarding the dispute and any correspondence with any other entities regarding the dispute (including outside counsel, regulatory agencies, and courts). Provide copies of all contracts, contract amendments and agreements related to settlement of each dispute.
- AG-1-2      Refer to Exhibit NSTAR-RBH-6. Please provide a complete copy of all studies and reports used in the development of this exhibit. If any of the studies or data have been updated or superceded by new, updated or corrected, data, studies or reports, please update the exhibit and provide the updated, corrected data, studies or reports.
- AG-1-3      Please provide copies of all invoices for services related to divestiture of purchase power contracts. What is the Company's current estimate of total costs for outside services related to the divestiture that the Company intends to seek recovery of? Include all workpapers, calculations and assumptions supporting the estimate. Include an estimate of any other PPA divestiture related costs that the Company anticipates recovering with the underlying workpapers, calculations and assumptions.
- AG-1-4      Refer to Exhibit NSTAR-RBH, page 17, lines 5-8. Please provide copies of all bids received on December 3, 2003.
- AG-1-5      Refer to Exhibit NSTAR-RBH, pages 17 and 18. Please provide copies of all communication between CEA, NSTAR and bidders.

- AG-1-6 Refer to Exhibit NSTAR-RBH, page 18, lines 3-5. Please explain how Pittsfield was involved in the auction process. Provide copies of all communication between CEA, NSTAR and Pittsfield relating to the auction and the termination or buy down of the contracts.
- AG-1-7 Refer to Exhibit NSTAR-RHB-6. Please provide this exhibit in the form of a working spreadsheet model with all formulas and cell references in tact.
- AG-1-8 Refer to Exhibit NSTAR-RBH, page 21, lines 4-15. Please provide all “re-priced” bids and all correspondence related to initiating and accepting or rejecting these bids.
- AG-1-9 Refer to Exhibit NSTAR-GOL-4 (for each Cambridge and Commonwealth). Please provide all workpapers, calculations, assumptions and other documentation supporting the projections of revenue related to the sale of the Pittsfield entitlements. The response should include the support for each discrete product (energy, capacity, FTRs, ARRs, transmission credits, ancillary service products, etc.). If the Company did not include any estimated revenue stream in its analysis, please estimate these amounts for each remaining year of the Pittsfield contracts and provide all supporting documentation. Provide these calculations in the form of working spreadsheet models.
- AG-1-10 Please provide the actual monthly kWh purchases from Pittsfield for each of the companies for the period January 1, 1997 through June 30, 2004. Include the corresponding availability factor for the unit.
- AG-1-11 Refer to Exhibit NSTAR-RHB-6, pages 2-3. Please provide the actual cost data for each month January 1, 1997 through June 30, 2004 for each of the categories listed in referenced exhibit.
- AG-1-12 Please provide the revenues received by each of the companies for sales for any Pittsfield energy, capacity or other product for each month for the period January 1, 1997 through June 30, 2004. Include the quantity or volume for each product.